

1. HOLLI R. DAVENPORT
an individual

Plaintiff

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Demanded

2. OKLAHOMA STATE UNIVERSITY MEDICAL TRUST

Defendant

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) Case no. 15-cv-512-JED-PJC

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Jury Trial

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MOTION FOR DEFAULT BY THE CLERK

COMES NOW, the Plaintiff by and through her attorney of record and asks the Clerk of the court to enter default against the above named Defendant pursuant to Federal Rules of Civil Procedure 55(a). In support of this Motion the Plaintiff shows as follows:

1. The Plaintiff filed her complaint on September 2nd 2015 and amended the complaint to change the name of the Defendant on November 21st 2015
2. Summons was issued by the clerk for the United States District Court for the Northern District of Oklahoma on November 23rd 2015.
3. That said summons was served certified mail restricted delivery return receipt requested by the United States Postal Service on November 25th 2015 to the apparent Chief Executive Officer of the organization. The Defendant had no registered agent in the state at the time.
4. That said summons was returned properly executed and filed with this court on the February 4th 2016.

5. That the Defendant has failed to plead or otherwise defend its case as allowed by these rules.
6. Plaintiff's counsel affirms that the Defendant is not an infant and is competent to participate in these proceedings; nor is the defendant a member of any of the military services.

WHEREFORE, the Plaintiff prays that the Clerk of Court enter default against the Defendant in this action.

Respectfully submitted

/s/ David Blades

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